

**REMARKS/ARGUMENTS**

Applicants respectfully request further examination and reconsideration in view of the arguments set forth fully below. Claims 111, and 114-119 have been rejected.

**Claim Rejections under 35 U.S.C. § 101**

Within the Office Action, claims 117 and 119 have been rejected under 35 U.S.C. § 101 because the language of the claim raises a question as to whether the claim is directed merely to an abstract idea that is not tied to a technological art, environment or machine. Applicants are not certain they understand the rejection and thus attempt to respond with the following remarks.

Claim 117 is directed to a multi-media conversion and integration system that operates on files. The system accepts one or more input multi-media files, and produces an output file. This is clearly directed to a computer or similar device, which uses multi-media files. Claim 119 is similarly directed to a multi-media conversion and integration system that operates on files. Thus, claim 119 is similarly directed to a computer or similar device which operates on files. In both instances, the tangible results are output files, which necessarily must be stored in magnetic or similar media, in a form which may be detected and reproduced by machines. Applicants accordingly request that the section 101 rejection be withdrawn.

To the extent these remarks are considered unresponsive or unpersuasive, Applicants request a more detailed statement of the deficiencies of claims 117 and 119 with respect to 35 U.S.C. § 101.

**Rejections under 35 U.S.C. § 103**

Within the Office Action, Claims 111, and 114-119 have been rejected under 35 U.S.C. § 103(a). Independent claims 111, and 117-119 are rejected as obvious over combinations of U.S. Patent No. 6,336,124 to Alam et al. (hereinafter "Alam"), U.S. Patent No. 6,616,700 to Thum et

al. (hereinafter "Thum"), and U.S. Patent No. 6,509,910 to Agarwal et al. (hereinafter "Agarwal").

Alam teaches a method of converting a document image stored in one format into other formats for manipulation and display. Alam's method locates data in the input document, groups data into one or more intermediate format blocks in an intermediate format document, and converts the intermediate format document to the output format document using the intermediate format blocks. Alam teaches the breakdown of only text and image files by locating words in the input document, joining words satisfying a line threshold into lines, joining lines satisfying a paragraph threshold into paragraphs, locating tables, and locating tags or control characters in the input document. [Alam, col. 2, lines 14-25]

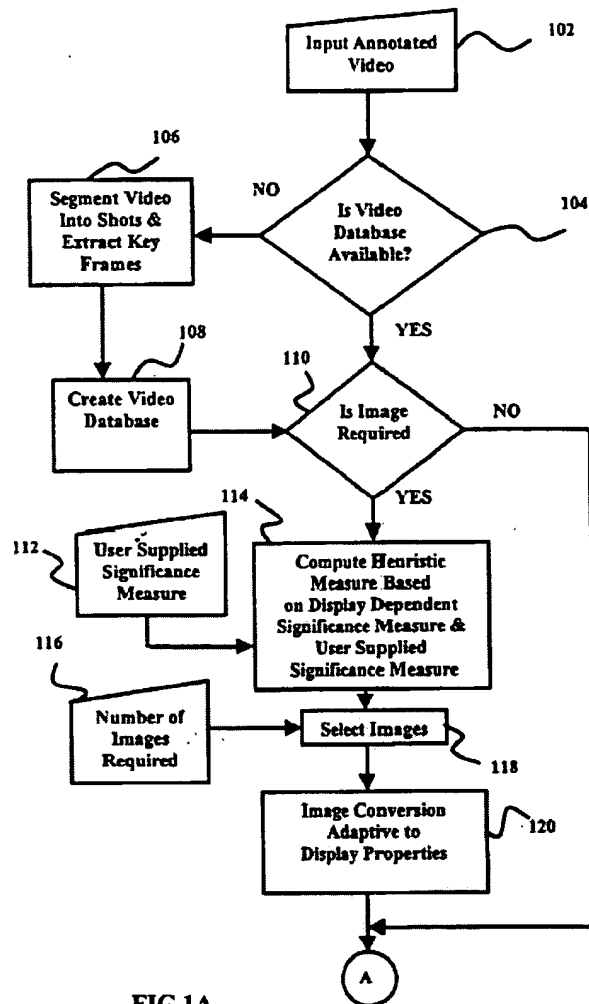
Alam does not teach a method for converting all types of multimedia input files into multiple target formats. In particular, Alam does not teach the decomposition of files containing animation or sounds, only image and text files. Alam teaches only that "the intermediate and output format document preferably *retains* any embedded animation, sounds and/or music, as well as the execution of links to start up other applications." [Alam, col. 21, lines 14-17] Thus, if the executable(s) contained in the original input document is supported or executable by the output device, the executable is merely retained rather than decomposed into primitives, otherwise the executable is removed to avoid error messages. [Alam, col, 21, lines 17-25]

Thum teaches a system for converting video into different formats. This is done based on user requirements. [Thum, Abstract] Video shots are extracted from input data. [Thum, col. 5, lines 11-14] User input data is then used to determine significance of portions of the video to determine which portions of the video data are most significant, and thus most worthy of including in output data. [Thum, col. 5, lines 35-44] The images are selected in part based on

input from the user about the number of images required. [Thum, col. 5, lines 61-64] Thus, Thum does not involve automatic conversion of input data into an intermediate format or output format – user involvement in the process is integral.

Agarwal teaches a digital media frame (DMF) and a method for sharing objects displayed on a DMF. [Agarwal, col. 2, lines 49-51] The DMF is depicted in Fig. 4. Most exemplary are Figs. 14 and 15, which illustrate that a server provides information which can be accessed by DMFs at multiple locations. The entire point of the system is to be able to receive content in various formats, and to deliver that content to a set of DMFs through a network. Thus, Agarwal teaches a system which is designed to provide a single output format.

Claim 111 is rejected under 35 U.S.C. § 103 over Alam in view of Thum. However, the combination of Alam and Thum is not appropriate in achieving the claimed invention. Alam teaches a system for converting documents into various formats, and attempts to retain links to embedded data such as video data. Alam automatically recognizes text as an image for purposes of converting it into other display formats. Thus, Alam teaches away from automatically identifying and decomposing multi-media data – it teaches that still image data can be recognized as text, and that other data should be left undisturbed. Thum teaches a system for converting video data on a manual basis. This is illustrated by the input provided in the process of Fig. 1A, below. Note that elements 112 and 116 use the symbol for manual input.



Furthermore, Thum does not automatically recognize text, it accepts textual input. Thus, Thum teaches away from automatically identifying and decomposing multi-media data into multi-media primitives. It teaches using user input to identify and decompose multi-media data. Therefore, both Alam and Thum teach away from the claimed combination.

Claim 111 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum and further in view of Agarwal. As pointed out, Alam and Thum teach away from this combination. Agarwal further teaches away from this combination, as it does not pertain to providing a plurality of target formats. Target formats involve multiple different receiving components. In

Agarwal, the receiver is always the DMF of Fig. 4 of Agarwal. Thus, Agarwal does not legitimately provide output files for a plurality of target formats. Rather, Agarwal aggregates various sources of data into a single format as illustrated in Fig. 14, which is reproduced below. .

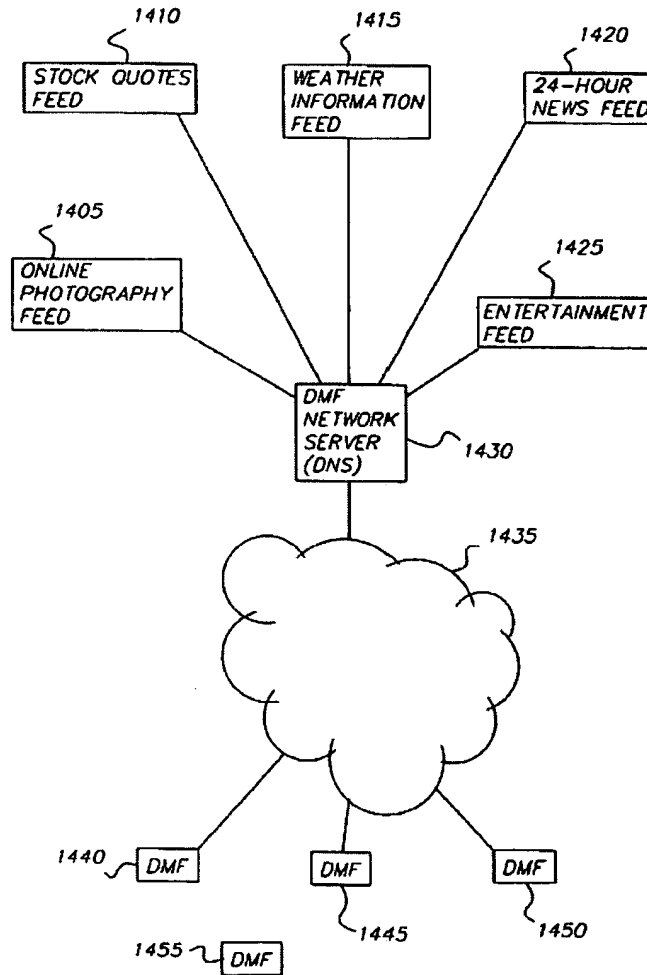


FIG. 14

As a result, Agarwal teaches away from a combination with Alam and Thum to produce the claimed invention as it teaches away from providing output files for a plurality of formats. For at least these reasons, the rejections of claim 111 should be withdrawn.

Claim 117 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum. Claim 117 claims a transformation module which automatically identifies and converts multi-media components and integrates the multi-media components into an intermediate format file. As pointed out above with respect to claim 111, Alam and Thum teach away from this requirement.

Claim 117 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum, further in view of Agarwal. Claim 117 further claims that the transformation module integrates the multi-media components into output files corresponding to a plurality of target formats. As pointed out with respect to claim 111 above, Agarwal teaches away from providing a plurality of target formats, it provides output for a single target, the DMF. For at least these reasons, the section 103 rejections of claim 117 should be withdrawn.

Claim 118 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum. Claim 118 claims a computer-readable medium that carries instructions for a method. The method includes automatically identifying and converting multi-media components and integrating the multi-media components into an intermediate format file. As pointed out above with respect to claim 111, Alam and Thum teach away from this requirement.

Claim 118 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum, further in view of Agarwal. The method of claim 118 further includes integrating the multi-media components into output files corresponding to a plurality of target formats. As pointed out with respect to claim 111 above, Agarwal teaches away from providing a plurality of target formats, it provides output for a single target, the DMF. For at least these reasons, the section 103 rejections of claim 118 should be withdrawn.

Claim 119 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum. Claim 119 claims a means for automatically identifying, a means for automatically decomposing and a

means for automatically converting multi-media components into an intermediate format file. As pointed out above with respect to claim 111, Alam and Thum teach away from this requirement.

Claim 119 is also rejected under 35 U.S.C. § 103 over Alam in view of Thum, further in view of Agarwal. Claim 119 further claims means for integrating the multi-media components into output files corresponding to a plurality of target formats. As pointed out with respect to claim 111 above, Agarwal teaches away from providing a plurality of target formats, it provides output for a single target, the DMF. For at least these reasons, the section 103 rejections of claim 119 should be withdrawn.

Furthermore, Applicant renews the remarks of April 12, 2005, which are believed to provide further reasons for withdrawal of the rejections.

With respect to claims 114-116, each of these claims depend on allowable base claim 111, and rejections to these claims are understood to depend on the rejection of claim 111. Accordingly, rejections of claim 114-116 should also be withdrawn.

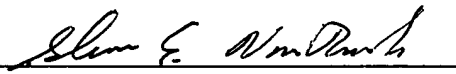
**Conclusion**

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, the Examiner is cordially invited to telephone the undersigned counsel at (650) 838-4300 to arrange for such a conference.

No fees are believed to be due beyond those noted in the included transmittal letter, however, the Commissioner is authorized to charge any underpayment in fees to Deposit Account No. 50-2207, including any funds necessitated due to a check being drawn on an account with insufficient funds. To the extent necessary and not otherwise requested, Applicant requests an Extension of Time to respond to the Office Action, and requests that the fee for such an extension be charged to Deposit Account number 50-2207.

Respectfully submitted,  
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Date: October 3, 2005

  
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